

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JOSHUA FIELDS,

Plaintiff,

vs.

GREAT LAKES INSURANCE SE,

Defendants.

Case No. CIV-21-986-G

PLAINTIFF'S INITIAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a)

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), Plaintiff, Joshua C. Fields, by and through his attorney of record Scott R. Jackson hereby submits the following disclosures:

- i. The following individuals are likely to have discoverable information relevant to the Plaintiff's allegations in this case:**

Joshua C. Fields Plaintiff c/o Plaintiff's counsel	Facts and circumstances relevant to the purchase of the insurance policy, payment of premiums and submission of claim for benefits. Facts and circumstances relevant to the insured building, its use, maintenance and upkeep. Facts and circumstances relevant to the condition and use of the insured building at the time of the fire. Facts and circumstances relevant to his interaction with Defendant regarding his claim for benefits due to the fire loss.
Jessica Fields 413 South 3 rd Street Ponca City, OK 74601	Plaintiff's wife. Her knowledge of the insurance policy with Defendant, its issuance to Plaintiff and payment of premiums. Her knowledge of the insured building, its use, maintenance and upkeep. Her knowledge relevant to the use of the insured building and its condition at the time of the fire. Her knowledge and involvement in the Plaintiff's claim for benefits submitted to Defendant and activity relevant to the claim process under Defendant's direction.
Mr. Kevin Wilson	His knowledge and involvement in the opening

Capstone ISG, Inc. 13506 E. Boundary Road, Suite A Midlothian, VA 23112	and handling of Plaintiff's claim for benefits under Defendant's insurance policy.
Ms. Catherine Aufderheide Capstone ISG, Inc. 4563 Lifestyle Lane Midlothian, VA 23112	Her knowledge and involvement in the opening and handling of Plaintiff's claim for benefits under Defendant's insurance policy.
Mr. Derek Cassidy Ponca City Fire Department 516 E. Grand Ave. Ponca City, OK 74601	His knowledge and opinions on the city code requirements relevant to Plaintiff's building at the time of the fire. His involvement in providing information to persons handling and investigating the claim for benefits.
Mr. Keith Alston <i>Address to be provided upon receipt</i>	Facts and circumstances to his work on insured building at or near the time of the fire.

ii. The following documents and items are likely to have information relevant to the Plaintiff's allegations in this case:

- a) Great Lakes Insurance SE insurance policy no. BC003908;
- b) Notice of property loss issued to Great Lakes Insurance SE on March 26, 2020;
- c) Great Lakes Insurance SE claim file(s) for claim no. 123391;
- d) July 7, 2021 letter from Capstone ISG denying benefits for claim no. 123391;
- e) Ponca City Fire Department incident report; and
- f) Ponca City Police Department incident report.

iii. Computation of Plaintiff's damages:

- a) Value of insured building at time of loss; and
- b) Compensatory damages arising from tortious conduct (violation of implied duty of good faith and fair dealing .

These damages have been pled in excess of \$75,000.00.

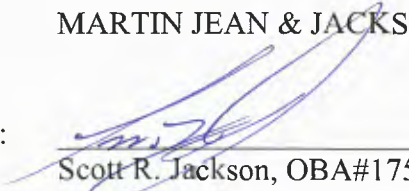
iv. Insurance agreements:

Not applicable.

Respectfully submitted,

MARTIN JEAN & JACKSON

By:

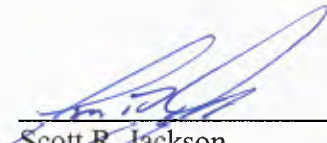

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Attorney for Plaintiff

CERTIFICATE OF MAILING

I hereby certify that on this 16th day of December 16, 2021 a true and correct copy of the above and foregoing instrument was placed in the U S Mail with proper postage affixed thereto to the following:

Ms. Sara E. Potts
Mr. Michael Linscott
Doerner Saunders Daniel & Anderson
210 Park Avenue, Suite 1200
Oklahoma City, OK 73102
Attorneys for Defendant



Scott R. Jackson